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VIA ECF

The Honorable Sarah L. Cave
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1670
New York, NY 10007-1312

Re: *Flynn et al v. Cable News Network, Inc.*, No. 1:21-cv-02587-GHW-SLC

Dear Judge Cave:

We represent Defendant Cable News Network (“CNN”) in the above-referenced action. Pursuant to Federal Rule of Civil Procedure 5.2(e) and 26(c), and Your Honor’s individual practice rule 1.G, we respectfully request to file the redacted portion of our Reply letter-motion (ECF No. 113) under seal given that the document excerpted on page 2 therein has been designated by Plaintiffs as “Highly Confidential” pursuant to the March 15, 2022 Confidentiality Stipulation and Protective Order (Dkt. 60) in this action.

We thank the Court for its consideration of this matter and apologize that we did not make the application before filing.

Respectfully Submitted,

Davis Wright Tremaine LLP

A handwritten signature in blue ink, appearing to read 'Katherine M. Bolger'.

Katherine M. Bolger